

Central Lancashire Local Plan 2023-2041

THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING)
(ENGLAND) REGULATIONS 2012



Regulation 19 Pre-Submission Plan

REPRESENTATION FORM

Part B: Please use a separate sheet for each representation you wish to make

Name or Organisation:	FI Real Estate Management Ltd
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3. To which part of the Local Plan does this representation relate?

Please provide the reference of the policy, paragraph, policies map, evidence etc that your comment relates to. Please use a separate Part B form for each element of the plan (i.e. policy, paragraph, site, document) that you wish to comment on.

If comments do not provide a reference, or are submitted on a single form and relate to multiple elements of the Plan, then the Council will assign and/or separate these points out as it considers most appropriate for submission to the Planning Inspectorate.

Comment being made against:	Reference (please provide)
Policy:	Policy EC1 (Strategic Policy) Scale of Economic Growth
Paragraph:	5.6 to 5.11
Development Site:	
Policies Map:	
Evidence:	Employment Land Study Update 2025, BE Group
Other (Please state):	

4. Do you consider the Local Plan is:

	Please check the relevant box	
	Yes	No
1) Legally compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2) Sound	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(If you check 'No', please also confirm below which of the 'tests' it fails to meet)		

a) Positively prepared	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Justified	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Effective	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Consistent with national policy	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3) Complies with the duty to co-operate	<input type="checkbox"/>	<input type="checkbox"/>

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible (e.g., if objecting on the basis of legal compliance, please quote the specific law that the Central Lancashire Local Plan does not comply with).

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

This policy sets out the scale of economic growth that the CLLP wants to see delivered over the plan period. The representor has serious concerns about the policy by reference to the amount of development proposed. It also has concerns about the deliverability of a number of sites where development is proposed; for example Preston West and Cuerden. It also has concerns that the CLLP ignores demand for certain forms of employment development in specific identified locations, for example, major logistics site to serve Chorley on the M65 corridor.

It is our view that the employment land requirement for the Central Lancashire area as set out in the CLLP needs to be substantially increased, and a revised employment land/development strategy needs to be promoted if economic development and related growth targets are to be met.

Regarding specific criticisms, the representors views on these matters is bolstered by an independent review by Iceni of the ELS Update 2025, which is the foundation of this policy. The Iceni Report(appendix) is submitted in support of these representations.

Key conclusions of this review are that the identified industrial need for Chorley has been reduced between the current and previous Employment Land Studies. This reduction in need is inappropriate given the heightened industrial demand Chorley and Central Lancashire has seen over the past decade. Market signals point to suppressed demand resulting from a lack of supply coming forward. The previous

local plan failed to deliver a sufficient amount of employment development towards 2026 and this unmet need should be reflected in the next Plan Period.

Additionally, the Central Lancashire employment needs evidence only reflects local employment land need and does not consider provision of sites that can meet a strategic sub-regional land need. There are few if any options for strategic sites in Chorley.

Across the North West, the UK's defence sector has become increasingly important to the economy – both in terms of manufacturing and the supporting supply-chain. Lancashire has a strong presence in the defence sector, and it is essential that employment land is provided to support this sector as geo-political uncertainty becomes increasingly volatile.

The Property Market Area (“PMA”) defined in the appended Icen Report are the boroughs of Chorley, Preston, South Ribble and Blackburn with Darwen, Hyndburn and Burnley, following the M6, M61 and M65 corridors. Analysis of market indicators reveals that vacancy and availability rates for strategic units have been historically low across Chorley, Central Lancashire and the defined PMA and have been below 1%, only rising within the past year due to much needed deliveries. As a result of low vacancy and availability rates, net absorption has been noticeably suppressed since 2018, exacerbated by a lack of deliverable floorspace.

Taking account of allocations and draft allocations (up to Regulation 19 stage), there is a 120ha supply of land for strategic units across the PMA, of which of which 76ha is within Central Lancashire and 10ha in Chorley.

The net absorption and completion model for strategic units reveals a need for 38-65ha of land in Chorley; 133-150ha in Central Lancashire and 322-353ha in the PMA. Taking account of pipeline land supply the residual need for employment land for strategic units is:

- Chorley: 28-55 ha
- Central Lancashire: 57-74ha
- PMA: 202-233ha

Icen recommends that the need for strategic units is considered at the wider PMA level and that the net absorption model is accurate for this work as it suffers less from historic under delivery. As a result the requirement needs to be increased up to 233ha across the PMA.

Overall there is an evident demand for providing strategic units within Chorley but also within Central Lancashire and across the wider PMA. This is not being recognised in the Central Lancashire Employment evidence base or Regulation 19 version of the CLLP. The representor has a proposed development of a 40.3ha at

Stanworth, M65 Junction 3 that **would** contribute to meeting this immediate need for strategic units and for logistics use.

In addition to the points made above, the representor also has concerns that even if the current CLLP employment land strategy were to be endorsed and accepted, the planned allocations won't meet the full need, certainly not where it is needed, nor for special forms of employment development like logistics, including where need for such developments is greatest – including need for a logistics site in Chorley on M65.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Given the fundamental concerns to the employment land evidence underpinning Policy EC1 we do not consider there is a meaningful amendment feasible, and that the plan is unsound, unjustified and lacking appropriate evidence to take forward without revision to the evidence base. It will have corresponding implications for housing land requirement, further emphasising our concern the plan fails to properly plan for future needs.

(Continue on a separate sheet /expand box if necessary)

Please note: In your representation, you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues identified during the examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Please check the relevant box

No, I do not wish to participate in hearing sessions	<input type="checkbox"/>
Yes, I wish to participate in hearing sessions	<input checked="" type="checkbox"/>

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The amendment is inter-related with wider spatial vision, strategy and economic policy representations made, and the representation here and in the appended Icen Report is fundamental to our criticism of the evidence base and approach of the Local Plan.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Please return your completed representation form(s) by post to: Planning Policy Team, Third Floor, Town Hall, Lancaster Road, Preston, PR1 2RL by filling in this representation form.

Forms must be received by midnight on Monday 14 April 2025.

